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July 12, 2021

Via ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

***Re: U.S. A. v. Miguel Trujillo
Case No. 16-CR-108 (PKC)***

Dear Judge Chen:

Defendant Miguel Trujillo is respectfully seeking a modification of his conditions of release to permit him to travel within the United States. The defendant shall notify his pre-trial services officer 48 hours prior to any travel and provide his pretrial services officer with a detail itinerary.

Mr. Trujillo has been out on bond, without any violations since March 7, 2016. His original bond conditions limit his travel to the state of New York, New Jersey, and home state of Florida. Mr. Trujillo is seeking this modification so that he can obtain employment that will require him to travel within the United States. Occasionally, he will also be traveling to visit friends and family.

Undersigned counsel has conferred with AUSA Samuel P. Nitze who does not object to this request.

Respectfully submitted,
By: Frank Schwartz
Frank Schwartz, Esquire
Fla. Bar # 120205

cc: AUSA Samuel P. Nitze (by ECF and email)
U.S. Probation (by email)